

June 7, 2002

Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

RE: RM-6783 Petition for Reconsideration of Order 01-372

Dear Sirs:

I agree with both the factors and conclusions in the referent petition by W. Lee McVey and subsequent comments by Mr. James A. Cour. I would like to specifically address paragraph 6 of FCC 01-372:

“In this regard, we note that there are other methods amateur radio operators can use to transmit amateur service communications that do not require an antenna installation at their residence. These methods include, among others, operation of the station at a location other than their residence, mobile operations, and use of a club station.”

My personal operations are almost exclusively with regard to handling messages or radiograms *gratis* for the general public through the ARRL National Traffic System (NTS). I handle between 200 and 400 radiograms per month including 24 hour precipitation reports for NAAO National Weather Service (NWS). I have ARRL Field appointments as Official Relay Station and Assistant Net Manager for the Michigan Traffic Net, QMN. I often serve as Net Control Station (NCS) for section and regional nets on 80 meters. I have a NAAO certificate of recognition, ARRL Brass Pounders League medallion for three successive months of 100 or more originations of third party traffic plus deliveries, and am recognized frequently in *QST*, the official magazine of the ARRL in the Public Service Honor Roll section. A review of Section Managers' Reports for March in *QST* shows 101,393 amateur radio station check-ins, or participation, in 5,593 net sessions (29 of 71 sections reporting). Section Traffic Managers reported 589 individual stations handled 72,437 pieces of traffic (47 of 71 reporting).

Participation in the above provides training and operator skill development necessary for efficient and effective operation in case of a local or national emergency. My net activity involves contacting other amateurs throughout the state as well as between Maine and Florida on a regular basis. I would like to advance further in the NTS hierarchy, but my present property size of 46 by 132 feet limits any antenna configuration. Hence, I cannot serve reliably as NCS for wide area nets or act as liaison for inter area nets as I would like to do.

The suggestion that these activities could be accomplished at another station, in a vehicle or club station simply fails to recognize the details of traffic net participation. A dedicated and active traffic handler may participate in two nets per night – the first being at 6:30 PM, the second at 10:00 PM. On a busy night he may have commitments to check into four to five nets within the same time frame.

Maintaining such a schedule from a car, another location or a club station is possible, but would

require extraordinary time and effort. Considering that HF operation from a car is less than optimal there would be a degradation of performance. Also, a Home Owners Association or Architectural Control Committee inclined to disprove of amateur antennae would surely find a HF antenna on a car objectionable as well. It would most certainly be an imposition on someone else to interrupt several times during the course of the evening to use his station. I presently belong to three clubs with club calls. However, none of the three have a permanent club station. Henry Ford Community College about 4 miles from my residence has club station, K8UTT, but I am not affiliated with the college and I they may not welcome my schedule superimposed on their own. Also, trying to operate in such a manner would unnecessarily take one from home and family. A working person would find such activity especially burdensome. Also, a blind or otherwise handicapped person would have extreme difficulty participating in the ways suggested by FCC.

Sometimes during emergency weather conditions our section net members are asked to provide updates for the NWS every three hours or so, and to monitor the HF frequency for bulletins throughout the storm period. It is enough of an effort as is to take a snow measurement during a blizzard or rain gauge reading during heavy downpours without the added inconvenience of operating from a cold car, or driving to a remote station late at night during these conditions.

I have been looking for property in Georgia since the first of the year. My admittedly limited experience thus far is that new subdivisions, in my price range of interest, visited within a 60 mile radius of Atlanta have CC & Rs which preclude amateur radio antennae. I have about concluded that in this area, aside from finding property not close to hospital, or industrial plant, or major highway, or a commercial AM radio station, or cross country high power lines and with good elevation and no signal limiting terrain and outside any historic district, I must limit my search to: stand alone property (not in a new subdivision), an existing home owned by a ham, farm land (\$6-10K per acre), or a trailer hidden in the deep woods. I did find an ideally suitable 10 acre lot on a country road in a rural county (350 sq mi with 15,600 people), but alas, that property even had CC & Rs which specifically prohibits outside antennae.

Due to the above, I think FCC should re-interpret PRB-1 so that CC & Rs are preempted by federal law so that dedicated, federally licensed, amateur radio operators can carry out their legal activities as a free community resource in the most efficient manner without unnecessary burdens and inconveniences.

Sincerely,

Gerald E. Abbott
Amateur License K8GA